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E.P.A. — D.L.P.C.
STATE OF ILLINOISF. K. Webb
Manager

Amoco Oil Company

Wood River Refinery
Post Office Box 182
Wood River, Illinois 62095
Manufacturing Department
618-254-7351

MADISON CO.

WOOD RIVER / AMOCO

March 19, 1980

Illinois Environmental Protection Agency
Land Field Operations Section
Division of Land/Noise Pollution Control
115A West Main Street
Collinsville, Illinois 62234Attention: Mr. Kenneth G. Mensing
Southern Regional Manager

Gentlemen:

IEPA No. 5500; Enforcement Notice

This letter is in response to an enforcement notice, IEPA No. 5500, received by Amoco Oil Company on March 11, 1980. We want to assure you that we have not ignored past communications on this subject, that we are aware of our problem, and that we are actively pursuing a solution.

As a first step towards compliance we have stopped on-site disposal of clay used to filter jet fuel and polybutenes; these two materials were originally included in the "composite filter sludge" for which two landfills hold supplemental permits. We will stockpile other wastes until supplemental permits can be obtained for their landfill disposal. Instructions have been issued to our people that there is to be no further disposal of wastes on our riverfront property.

Under the Environmental Protection Act as originally passed in 1970, we believed we were exempt from any permitting requirement for disposal of our solid wastes on our property by virtue of Section 21(e). The Act was later amended to exclude hazardous wastes from this exemption. We had ceased on-site disposal of oily solids, which might be considered to be hazardous, in 1973. However, we continued on-site disposal of materials we believed to be non-hazardous.

In June of 1979, we contacted the Agency for information on permitting a solid waste disposal operation. Upon receipt of the forms, a decision was made to retain outside help in preparing the application. Accordingly, we retained Mr. John Mathes, a hydrologist, and later Mr. Douglas Andrews, a consulting engineer, to assist us in this problem. Mr. Andrews made an assessment of the situation, had a preliminary meeting in Springfield with Mr. Tom Cavanagh, Manager Permit Section, Division Land/Noise

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ILL. E.P.A. — D.L.P.C.
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Pollution Control, and then submitted a summary of his activities to us. On October 16, 1979, he accompanied two Amoco representatives in another meeting with Mr. Cavanagh to discuss permitting our disposal operations.

Development of a program for incineration of solid and liquid wastes was progressing at the same time. As the attached chronology shows, an incineration project was initiated early in 1979. In fact, a study of incineration of wastes from the Wood River refinery was carried out some years earlier. Extensive pilot scale testing was done at the Amoco Chemicals plant in Decatur, Alabama in 1974. This project was deferred, however, after supplemental permits for landfill disposal of the wastes in question were obtained from the IEPA.

A "Basis of Design Memorandum" for an incinerator was issued by Amoco Oil on September 14, 1979 from known and estimated data on our solid and liquid wastes and surplus wastes from two other Amoco refineries. During the summer of 1979, multiple samples of various Wood River wastes had been collected for firming up quality data.

It was shortly thereafter that the incinerator project was transferred from Amoco Oil to Amoco Chemicals because the bulk of the wastes proposed for incineration were from the Amoco Chemicals operations at Wood River.

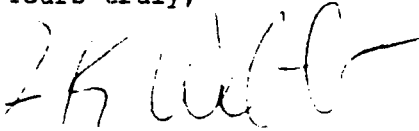
On October 26, 1979, Hydrosience, Inc. presented a proposal to Amoco Chemicals Corporation to develop a solid/liquid waste disposal program involving an incinerator at Wood River. A telecommunication of December 14, 1979 advising Hydrosience of Amoco Chemicals intention to award them this contract was confirmed by a January 3, 1980 letter. Representatives of Hydrosience, Amoco Chemicals and Amoco Oil met at Wood River on January 8 and 9, 1980 for orientation on the project. Amoco Oil contracted separately with Hydrosience to evaluate wastes from the Whiting, Sugar Creek, and Wood River refineries as feed to the incinerator.

The latest meeting on this project was in Wood River on February 29, 1980. In attendance were Mr. Mathes and Mr. Andrews, the Project Engineer on the incinerator project, and Amoco Oil representatives. At this meeting the consultants were asked to: 1) locate suitable sites for hazardous wastes landfills, 2) prepare a program of core sampling to assess the in-place wastes in our riverfront area, and 3) locate leachate monitoring wells to define the leachate plume from the disposal area.

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We would like very much to meet with you to discuss our plans, required permits, and completion of the closure of a particular portion of the disposal area. We will contact you in about a week to try to arrange such a meeting. Meanwhile, should you have any urgent questions, please contact R. S. McDaniel or E. J. Sullivan at 618/254-7351.

Yours truly,



F. K. Webb
Manager

EJS/de

Attachment

Illinois Environmental Protection Agency
Enforcement Programs
2200 Churchill Road
Springfield, Illinois 62706
Attention: Mr. Stanley Parsons
Assigned Technical Advisor

CHRONOLOGY, AMOCO SOLID WASTE DISPOSAL

April, 1979 - Incinerator project initiated. Began assembling information on volume and quality of candidate wastes for the incinerator. Multiple samples were taken through the summer and tested to establish quality.

June, 1979 - Inquired about permitting procedure. Received permit application forms and instructions from the IEPA. Decided to seek outside help to acquire data and prepare application.

July 17, 1979 - Mr. John Mathes, a consulting hydrologist, met with us to discuss the preparation of a permit application. Mr. Mathes suggested that we also retain a consulting engineer.

July 26, 1979 - Mr. Mathes and Mr. Douglas Andrews, a consulting engineer, met with us in Wood River. Mr. Andrews assessed the situation and later made a preliminary contact with Mr. Thomas Cavanagh, Manager Permit Section, Division of Land/Noise Pollution Control.

Sept. 4, 1979 - Mr. Andrews submitted a summary of his activities regarding the disposal area.

Sept. 21, 1979 - First inspection of disposal area by IEPA field engineer.

Oct. 4, 1979 - Date of letter from Mr. Mensing.

Oct. 15, 1979 - Date of reply to Mr. Mensing's letter.

Oct. 16, 1979 - Accompanied by Mr. Andrews, we met with Mr. Cavanagh in Springfield.

Dec. 17, 1979 - Second inspection of disposal area.

Dec. 27, 1979 - Date of letter from Mr. Mensing.

January, 1980 - Early in the month, we scheduled a meeting with Mr. Mensing for January 10.

Jan. 8 & 9, 1980 - Meeting at Wood River attended by engineering personnel from the General Offices of both Amoco Oil and Amoco Chemicals, Wood River refinery representatives, and representatives from Hydro-science, Inc.

CHRONOLOGY, AMOCO SOLID WASTE DISPOSAL

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Jan. 9, 1980 - Cancelled meeting with Mr. Mensing because of strike by OCAWIU represented refinery employees.

Feb. 14, 1980 - Third inspection of disposal area.

Feb. 27, 1980 - Date of letter from Mr. Mensing (not received until March 7).

Feb. 29, 1980 - Meeting at Wood River attended by Project Engineer for incinerator, Mr. Mathes, Mr. Andrews, and Wood River representatives.